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James A. Noel
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**STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT COURT**

BETHANI WHITE,
Plaintiff,

v.

No.

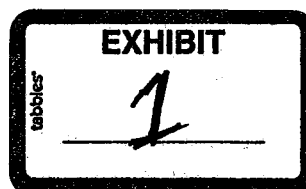
D-202-CV-2015-05476

**ALLSTATE PROPERTY AND
CASUALTY INSURANCE COMPANY,**
Defendant.

COMPLAINT FOR PERSONAL INJURY DAMAGES

COMES NOW the Plaintiff, by and through her attorney, Douglas A. Azar, and for her claim against Defendant, states:

1. Plaintiff Bethani White is a resident of Albuquerque, Bernalillo County, New Mexico.
2. Defendant Allstate Property and Casualty Insurance Company, is an Illinois Corporation doing business in Bernalillo County, New Mexico and at all times relevant to this Complaint was doing business in said County and State.
3. All events giving rise to this complaint took place in Albuquerque, Bernalillo County, New Mexico.
4. Venue in this Court is proper.
5. On July 3, 2008, Plaintiff Bethani White was involved in an automobile accident. Ms. White was a passenger in Zachary Martinez' automobile. Mr. Martinez was found to be at fault for the collision and as a result Mr. Martinez' insurance company



offered policy limits.

6. Due to the massive medical bills associated with Plaintiff's treatment, an underinsured motorist claim was sought against Plaintiff's parents automobile insurance, Allstate Property and Casualty Insurance Company.

7. Allstate Property and Casualty Insurance Company offered policy limits and the settlement was court approved on November 2, 2010.

8. Through *Jordan v. Allstate Ins. Co.*, 2010-NMSC-051, 149 N.M. 162, 245 P.3d 1214, Plaintiff is seeking additional monies from Defendant due to the massive medical bills related to Plaintiff's injuries.

WHEREFORE Plaintiff asks the court for judgment awarding damages to Plaintiff against the Defendant for compensatory damages, punitive damages, cost of this action, prejudgment interest and such other relief as is provided by New Mexico law.

AZAR LAW OFFICE, PC

/s/ Douglas A. Azar

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